

ACCURACY

PERFORMANCE

ACCOUNTABILITY

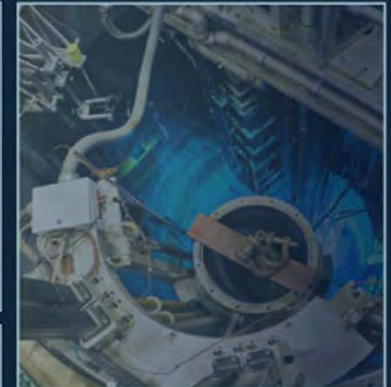


THE NUCLEAR MATERIALS MANAGEMENT AND SAFEGUARDS SYSTEM (NMMSS)

NMMSS 2013

USERS ANNUAL TRAINING MEETING

MAY 20-23, 2013 - ST. LOUIS, MISSOURI



Roundtable Discussion on NMMSS Licensee Issues

Tom Morello
CENG Supervisor – Nuclear Fuel Management

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Roundtable Discussion on NMMSS Licensee Issues

- During the 2012 NMMSS meeting, several issues were presented by the licensees. They were:
 - Inspection/Inspector consistency
 - “All” versus “reportable quantity”
 - Draft regulatory guide endorsing ANSI N15.8

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Roundtable Discussion on NMMSS Licensee Issues

- First Step...
 - Meeting held with Paul Peduzzi (NRC), Ron Albert (NRC), Andrew Mauer (NEI) and Tom Morello (CENG) October 2012.
 - The issues from the 2012 NMMSS meeting were brought to the attention of the NRC.

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Roundtable Discussion on NMMSS Licensee Issues

- Next step....
 - Meeting was held at NRC April 2013 to provide update and follow-up to the October discussion.
 - Same individuals involved at both meetings.



Roundtable Discussion on NMMSS Licensee Issues

- Key Issue: Concept of “all” versus “reportable quantity”:
 - 10CFR74.19(a) states that “each licensee shall keep records showing the receipt, inventory, acquisition, transfer and disposal of **all** SNM in its possession regardless of its origin or method of acquisition”.
 - NUREG BR-0006 and NUREG BR-0007 both state in their respective Regulatory Authority sections that DOE/NRC Forms (741/742/742C) are required for quantities of SNM 1 gram or more of Uranium-235, U-233, or Plutonium. Reporting of PU-238 is to be to the nearest tenth of one gram of the PU-238 isotope.
 - Why are reportable quantities or greater important to DOE/NRC/IAEA?
 - There is a gap between “all” and “reportable quantity”.

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Roundtable Discussion on NMMSS Licensee Issues

- Leads to: Inconsistency in MC&A inspections relative to less than reportable quantity items such as waste streams, laundry, etc.
 - several licensees have reported that MC&A inspections vary greatly in their breadth of inspection from region to region.
 - some regions report that inspectors are concerned with laundry and waste stream SNM while other regions do not report the same concerns.
 - NRC reiterated that waste streams and laundry are not on the inspection checklist.
 - However, if an inspector comes across documented SNM in laundry or waste streams, they may pull that thread and investigate further.
 - Feedback from NRC indicates that the SNM to be observed/inventoried/etc. is discrete/discernible/tangible – NOT calculated SNM.
 - Resolve via public meeting, letter, SFAQ, position paper, ANSI Standard revision, etc. or some combination of these options?

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Roundtable Discussion on NMMSS Licensee Issues

- The concept of aggregating less than reportable items into reportable quantities
 - NRC position: If the material in the 10 pigs are of different types (uranium and plutonium say) then they would not be required to be added together and reported if it would have met the reporting requirements. Also, if they are all the same material, like uranium, but different enrichment (some at 5%, some at 2% say) then those are separate items and would not be required to be added together. If the material is the same and the same enrichment then it needs to be added together and reported if it meets the reporting requirement.
 - Industry supports this position and believes it is consistent with current industry practice.
 - Have not been able locate this concept in regulations or guidance – is there a need to document this position? What is the best method(s) to do so?

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Roundtable Discussion on NMMSS Licensee Issues

- Administrative controls/procedures vs. physically re-inventoried
 - ANSI N15.8-2009 states in sections 7.5 and 8.3.5 that administrative controls/procedures shall be established so that records concerning the location and unique identifier are accurate.
 - NRC endorses the standard without exception.
 - Appropriate controls/procedures might be work order instructions, radiation work permits, and pre-job briefs.
 - Appropriate to document what would be acceptable for such controls going forward? Where?

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Roundtable Discussion on NMMSS Licensee Issues

- Draft regulatory guide endorsing ANSI N15.8-2009
 - A draft regulatory guide has been on the streets since July 2012 with no apparent approval date looming.
 - Approval is imminent!